

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

VLADIMIR GOLDSHTEYN, individually
and on behalf of all others similarly situated,

Plaintiff,

vs.

Case No. 1:10-CV-5402

ARGONNE CREDIT UNION,

Defendant.

**CONSENT MOTION FOR ENLARGEMENT OF TIME TO FILE A MOTION IN
OPPOSITION TO PLAINTIFF'S MOTION ON
CLASS CERTIFICATION**

Defendant, Argonne Credit Union ("Argonne"), by and through its attorneys, Gonzalez Saggio & Harlan, LLP, files its consent motion for enlargement of time to file its motion in opposition to plaintiff's motion on class certification until Wednesday, June 22, 2011, and for cause states as follows:

1. On March 30, 2011, plaintiff filed a motion for class certification in the instant matter;
2. This court ordered that the defendant file an opposition no later than June 20, 2011;
3. After discussion, the parties have agreed to extend the time for filing an opposition an additional two (2) days, until June 22, 2011;
4. The plaintiff has consented to the relief sought in this motion.

For the above reasons, Argonne requests the Court to grant their Motion and approve the requested deadlines.

Dated this 20th day of June, 2011.

/s/ Joshua F. Stubbins

Joshua F. Stubbins

State Bar No. 1062970

ATTORNEYS FOR DEFENDANT

Gonzalez Saggio & Harlan, LLP

225 E. Michigan, 4th Fl.

Milwaukee WI 53202

Telephone: 414-277-8500

Fax: 414-277-8521

Email: Joshua_stubbins@gshllp.com